

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

KOLESZAR FARM LLC

Debtor.

: CHAPTER 11

:

: BANKRUPTCY NO. 21-11653-amc

ORDER

AND NOW, upon consideration of the Debtor/Appellant's Application for an Extension of Time to Designation of Items and Statement of Issues on Appeal, it is hereby **ORDERED** that an extension is granted until December 3, 2021, to file the Designation of Items and Statement of Issues on Appeal.

BY THE COURT:

HONORABLE ASHELY M. CHAN
UNITED STATES BANKRUPTCY JUDGE

**IN THE UNITED STATES BANKRUPTCY COURT
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**APPLICATION FOR EXTENSION OF TIME TO FILE DESIGNATION OF ITEMS
AND STATEMENT OF ISSUES ON APPEAL**

The Debtor, Koleszar Farm, LLC, by and through counsel, Michael A. Giaramita, Jr., hereby requests an Extension of Time to File Designation of Items and Statement of Issues on Appeal, and in support thereof respectfully represents as follows:

1. This case was filed by the Debtor on June 11, 2021, to address the Debtor's obligation on a mortgage with Wilmington Trust, National Association, serviced by Fay Servicing, LLC, on the Debtor's real property, to address various tax, utility and other debts, and to reorganize the company's financial affairs.

2. On November 4, 2021, the Court held hearings on four interrelated matters and ruled against the Debtor on all matters.

3. The Debtor filed a timely appeal of the November 4, 2021 Orders in the four interrelated matters on November 18, 2021.

4. The Debtor had prepared its Designation of Items and Statement of Issues on Appeal to file on December 2, 2021, but counsel was working remotely to file the document, and due to a technical issue, the document was lost or erased.

5. The Debtor can reproduce the document and file it on December 3, 2021, and requests a one day extension in which to do so.

WHEREFORE, the Debtor requests this Honorable Court to grant the foregoing

Application for an extension of time, until December 3, 2021 to file the Designation of Items and Statement of Issues on Appeal.

Respectfully Submitted,
GIARAMITA LAW OFFICES, P.C., BY:

A handwritten signature in blue ink, appearing to read 'MAGI', is positioned above a horizontal line.

Michael Antonio Giaramita, Jr.
Attorney ID #319299
157 Little Conestoga Road
2nd Floor
Chester Springs, PA 19425

Attorney for Appellant

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CERTIFICATION OF SERVICE

I, Michael A. Giaramita, Jr., attorney for the Appellant in the above-captioned matter, hereby certify that on December 2, 2021, a copy of the Debtor's Application for an Extension of Time to File Designation of Items and Statement of Issues on Appeal was served on the following parties by ECF Notice or by e-mail, as indicated below, to the following addresses:

George M. Conway, Esquire
Trial Attorney
Office of the United States
U.S. Custom House
200 Chestnut Street, Suite 502
Philadelphia, PA 19106-2912

(ECF Notice)

Rebecca A. Solarz, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106-1322

(ECF Notice)

Koleszar Farm LLC
348 Pineville Road
Newtown, PA 18940

(E-mail)

GIARAMITA LAW OFFICES, P.C., BY:



Michael Antonio Giaramita, Jr.
Attorney ID #319299
157 Little Conestoga Road
2nd Floor
Chester Springs, PA 19425

Attorney for Appellant